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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**WOODLAWN FOUNDATION,**

**Plaintiff,**

**v.**

**UNITED STATES OF AMERICA,**

**Defendant.**

**Case No. 06-3113-CRB**

**PARTIES' THIRD STIPULATED  
REQUEST TO EXTEND  
DEADLINE TO REOPEN CASE  
AND ~~PROPOSED~~ ORDER**

**IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY  
REQUESTED** by and between the parties to this action, as reflected by the signatures of their  
respective counsel as set forth below, that the deadline to re-open this case should be extended for  
an additional ninety-one (91) days, from April 1, 2008 to July 1, 2008.

1. The parties have outlined the lengthy settlement process in their Second Stipulated  
Request to Extend the Deadline to Reopen Case.

2. The settlement proposal was submitted to the Department of Justice, Tax Division, on  
March 3, 2008. Because of the dollar amount at issue in this case, a second level of review by the  
Office of Review is necessary.

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3. The United States anticipates that all governmental review and IRS approval, if necessary, can be completed by July 1, 2008.

Respectfully submitted,

CARR, McClellan, INGERSOLL,  
THOMPSON & HORN

Dated: March 6, 2008 \_\_\_\_\_ /s/ Lage Andersen  
LAGE ANDERSEN  
Attorney for Plaintiff

JOSEPH RUSSONIELLO  
United States Attorney

Dated: March 6, 2008\_\_\_\_\_ By: /s/ Cynthia Stier  
CYNTHIA STIER  
Assistant United States Attorney  
Attorneys for the United States of America

## ORDER

Pursuant to the Stipulation of the parties as set forth above, and for good cause shown,  
**IT IS HEREBY ORDERED** that the deadline to reopen this case is extended from  
April 1, 2008, to July 1, 2008.

Dated: March 7, 2008

THE HONORABLE CHARLES W. BREYER  
UNITED STATES DISTRICT COURT

